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May 20, 2019

Via CM/ECF

Hon. Naomi Reice Buchwald, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Caiola v. Maisonneuve*, No. 1:18-cv-11646-NRB
Maisonneuve v. Caiola, No. 1:19-cv-02567-NRB
Joint Letter – Status of Accounting and Settlement Discussions

Dear Judge Buchwald:

The parties' jointly submit this letter, by the undersigned counsel, as directed by the Court on April 18, 2019 ("Order").

In accordance with the Court's Order Ms. Maisonneuve has provided to Mr. Caiola an accounting of the number of books she has sold in print and Amazon Kindle. Likewise, Mr. Caiola has provided to Ms. Maisonneuve an accounting of the expenditures he has made pursuant to the Investor Agreement. The parties are awaiting confirmation of all Kindle e-book sales. The parties have reserved their rights to challenge certain entries and assertions on the respective accountings.

Counsel to the parties have met and conferred with respect to the accountings and discussed their respective settlement positions. There remain further issues to resolve. Counsel believes that if settlement is to occur the parties would benefit from an additional thirty days to negotiate. Accordingly, the undersigned request that the Court set a tentative status conference

ENDORSEMENT

The parties should submit a status report by June 17, 2019. Thereafter the Court will determine next steps.

Naomi Reice Buchwald
USDC

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5/21/19



to be held after June 17, 2019. The parties would submit a written progress report by June 17, 2019.

Respectfully,

/s/ Robert Whitman

Robert Whitman

Counsel for Plaintiff/Defendant

Benedict Caiola

/s/ Ryan J. Cooper

Ryan J. Cooper

Counsel for Defendant/Plaintiff

Lockey Maisonueve

and

Defendants

Melissa Tropeano and

The MTL Communications Group LLC

VF:kk

cc: Benedict J. Caiola, Esq.

Lockey Maisonueve

Melissa Tropeano